

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 25-8126-RMM

FILED BY SP D.C.

Mar 10, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - West Palm Beach

UNITED STATES OF AMERICA

v.

ORELIEN MARTIAL NGUEPI-TANKOUA,
JEAN PAUL BAYOI, and
TAMBLYN MILTON FRASIER,

Defendants. /

CRIMINAL COVER SHEET

1. Did this matter originate from a matter pending in the Northern Region of the United States Attorney's Office prior to August 8, 2014 (Mag. Judge Shaniek Mills Maynard)? ☐ Yes ☒ No
2. Did this matter originate from a matter pending in the Central Region of the United States Attorney's Office prior to October 3, 2019 (Mag. Judge Jared M. Strauss)? ☐ Yes ☒ No
3. Did this matter involve the participation of or consultation with Magistrate Judge Eduardo I. Sanchez during his tenure at the U.S. Attorney's Office, which concluded on January 22, 2023? ☐ Yes ☒ No
4. Did this matter involve the participation of or consultation with now Magistrate Judge Marty Fulgueira Elfenbein during her tenure at the U.S. Attorney's Office, which concluded on March 5, 2024? ☐ Yes ☒ No

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

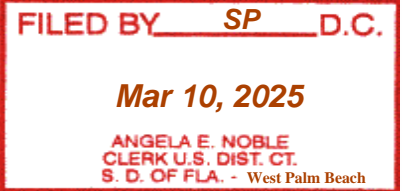
BY: Rinku Tribuiani

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AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
Southern District of Florida



United States of America
v.
ORELIEN MARTIAL NGUEPI-TANKOUA,
JEAN PAUL BAYOI, and
TAMBLYN MILTON FRASIER,

Case No. 25-8126-RMM

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 09/08/2021 - 10/04/2021 in the county of Palm Beach and Miami-Dade in the
Southern District of Florida, the defendant(s) violated:

Code Section
18 U.S.C. §1344
18 U.S.C. §1349

Offense Description
Bank Fraud
Conspiracy to Commit Bank Fraud

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Sworn to and attested to me by applicant by
telephone (Facetime) per the requirements of
Fed. R. Crim. P.4 (d) and 4.1.

Date: 3/10/25

City and state: West Palm Beach, FL


Complainant's signature
Special Agent Adam J. Weisenstine, FBI
Printed name and title


Judge's signature

Ryon M. McCabe, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Adam J. Weisenstine, being first duly sworn, hereby depose and state as follows:

I. INTRODUCTION AND AGENT BACKGROUND

1. I make this affidavit in support of a criminal complaint charging ORELIEN MARTIAL NGUEPI-TANKOUA (“TANKOUA”), JEAN PAUL BAYOI (“BAYOI”), and TAMBLYN FRASIER (“FRASIER”) with: Bank Fraud, in violation of 18 U.S.C. §1344, and Conspiracy to Commit Bank Fraud, in violation of 18 U.S.C. §1349, from on or about September 8, 2021 through October 4, 2021, in Palm Beach County and Miami-Dade County, in the Southern District of Florida, and elsewhere.

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since 2019. I currently serve on the Complex Financial Crimes squad in the FBI’s Miami Division, out of the West Palm Beach Resident Agency. My duties include investigations of violations of federal laws including bank fraud, wire fraud, mail fraud, aggravated identity theft, and money laundering. I have received training on the proper investigative techniques for these violations, including financial analysis, surveillance techniques; interviewing methods of subjects, witnesses, and victims; and the preparation and execution of arrest and search warrants. I have investigated individuals who committed various types of fraud offenses. For five years prior to joining the FBI, I served as a commissioned officer in the United States Army. I earned a Master’s degree in Business Administration (MBA) from Boise State University and a Bachelor of Arts degree in Finance from the University of St. Thomas (Minnesota).

3. The facts set forth in this affidavit are based upon my personal observations, my review of records obtained during the investigation, interviews of subjects and co-conspirators, my training and experience, and information I obtained from other law enforcement agents and

government personnel. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint, I have not included in this affidavit every detail of the investigation.

PROBABLE CAUSE

4. On or about August 19, 2021, United States Treasury Check (“Treasury Check”) number ending 7472, in the amount of \$1,174,9957.05, was issued and made payable to “Nationwide Annuity FBO [For Benefit Of] [Victim 1].” On or about August 19, 2021, or sometime after, the Treasury Check was placed into the mail system with United States Postal Service. This Treasury Check was an issuance of the entire funds from Victim 1’s retirement account under the Thrift Savings Plan¹ (“TSP”). Between August 19, 2021, and September 8, 2021, the exact date unknown, the Treasury Check was stolen, by unknown parties. The check was enroute to a financial advisor located in Palm Beach County, Florida.

5. On September 8, 2021, in Lawrenceville, Georgia, an individual identifying himself as “RICHARD MICHEL” opened Wells Fargo Bank account number ending 9786 (“Subject Bank Account”), in the name of “NATIONWIDE ANNUITY CO”. The associated address for this bank account was an address located in Atlanta, Georgia. Law enforcement was able to obtain surveillance images from when the Subject Bank Account was opened. On September 17, 2021, at approximately 8:01 PM, the Treasury Check was deposited into the Subject Bank Account at a Wells Fargo Bank branch in Sunny Isles, Florida, by an unknown individual via an Automated Teller Machine (ATM). Law enforcement was able to obtain surveillance images from the ATM deposit of the Treasury Check into the Subject Bank Account, shown below.

¹ The TSP is a retirement plan similar to a 401(k) for employees in federal government service.



6. On or about September 13, 2021, Victim 1 and his financial advisor (“V.G.”) contacted TSP to report non-receipt and place a stop payment on the Treasury Check. On or about September 29, 2021, Victim 1 learned that the Treasury Check was negotiated.

7. On October 5, 2021, a fraud specialist at the Federal Thrift Retirement Investment Board (FRTIB), the agency that oversees the TSP program, reported to law enforcement that the Treasury Check was fraudulently deposited into the Subject Bank Account. Law enforcement spoke with Victim 1, who confirmed that the Treasury Check was missing, and it was intended to be mailed to V.G. in Ocean Ridge, Palm Beach County, Florida.

8. Law enforcement notified Wells Fargo Bank about this matter. However, prior to this notification, approximately six or more checks were withdrawn, or attempted to be withdrawn, from the Subject Bank Account following the fraudulent deposit of the Treasury Check. The total amount of funds withdrawn or attempted to be withdrawn was approximately \$604,600. A temporary freeze was placed on the Subject Bank Account.

9. On October 15, 2021, a seizure warrant was issued in the Southern District of

Florida under case number 21-mj-04013. The United States Secret Service executed the seizure warrant for the remaining funds held in the Subject Bank Account. These funds, \$570,422.05, were provided to law enforcement via Cashier's Check ending 5360 on or about October 25, 2021.

10. Law enforcement's efforts to obtain information regarding the identity of "RICHARD MICHEL," who opened the Subject Bank Account, were unsuccessful. The name and accompanying driver's license utilized to open the account were not found to be legitimate per databases queried.

11. Law enforcement observed a seventh check (check number 1001) that was attempted to be withdrawn from the Subject Bank Account. This check was made payable to "MM Electrical Equipments & Services LLC" for \$42,500. The check was attempted to be deposited on October 6, 2021, into Bank of America account ending 1553 with authorized signer Mamahou Mahou ("Mahou"). This account was opened on or about October 4, 2021, in Georgia.

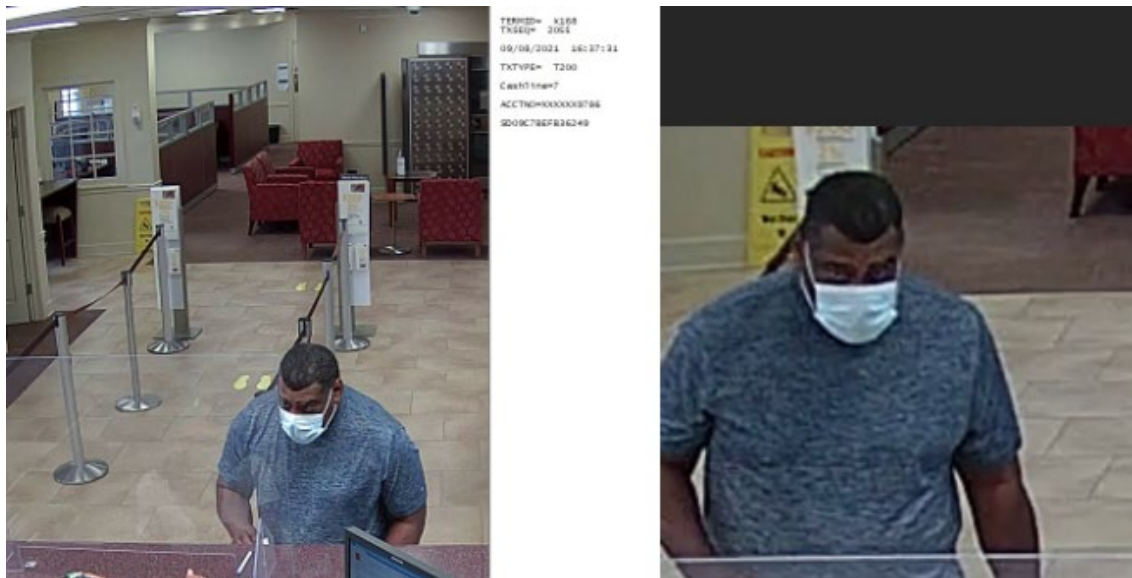
12. Surveillance images were obtained from Bank of America associated with account ending 1553. One of the images for account ending 1553 depicted a vehicle with an observable Georgia license plate. Georgia Department of Motor Vehicles returned a positive result for this license plate. The vehicle was registered to JEAN PAUL BAYOI ("BAYOI"). Another image also was obtained of an individual at the ATM for account ending 1553. The individual in this image appeared to have the same likeness observed in BAYOI's Georgia Department of Motor Vehicle record photograph.

13. On July 14, 2023, BAYOI was interviewed by law enforcement with his attorney present. BAYOI confirmed that he opened the "MM Electrical Equipments and Services LLC" account at Bank of America under his nephew's name, Mahou, who he said was deported at the

time. BAYOI confirmed that he attempted to deposit the \$42,5000 check (check number 1001, referenced above) from the Subject Bank Account into Bank of America account ending 1553.

14. During the interview on July 14, 2023, BAYOI stated he received approximately \$8,000 for his role in the deposit of check number 1001.

15. BAYOI was shown the image of the individual who opened the Subject Bank Account at Wells Fargo Bank. BAYOI indicated the individual who opened the Subject Bank Account was TAMBLYN FRASIER (“FRASIER”). BAYOI stated FRASIER was paid a nominal amount of money to open the bank account.



16. BAYOI was shown the ATM image from September 17, 2021, depicting the individual depositing the Treasury Check into the Subject Bank Account. BAYOI identified the individual in the photograph as ORELIEN MARTIAL NGUEPI-TANKOUA (“TANKOUA”). BAYOI originally met TANKOUA through Mahou, and the two have known each other for some time.

17. According to BAYOI, TANKOUA initially approached him regarding the Treasury Check and requested his assistance in opening the Subject Bank Account to facilitate its deposit.

BAYOI reported that TANKOUA offered him 20% compensation for his efforts. Utilizing the assistance of FRASIER, BAYOI successfully opened the Subject Bank Account for TANKOUA. Once the account was established, BAYOI stated that he sent TANKOUA the following items associated with the Subject Bank Account via FedEx: account opening documents, the associated email address and password, a debit card, and a cell phone linked to the account. BAYOI further indicated that TANKOUA and FRASIER are not acquainted with one another.

18. For BAYOI's participation in getting the Subject Bank Account open to facilitate the deposit of the Treasury Check, BAYOI stated he earned a total of approximately \$20,000.

19. On October 11, 2023, FRASIER was interviewed by law enforcement. FRASIER confirmed he opened the Subject Bank Account. BAYOI had contacted FRASIER about opening the account, and BAYOI also assisted with getting FRASIER fake identification that would be utilized to open the bank account. FRASIER denied knowing TANKOUA. FRASIER indicated he was paid a nominal amount to open the Subject Bank Account.

20. In order to open the Subject Bank Account, FRASIER stated that BAYOI provided him (FRASIER) with fake identification and a utility bill associated with the fake identification. After the Subject Bank Account was opened, FRASIER stated he returned the fake identification and associated utility bill back to BAYOI.

21. On July 23 and July 24, 2024, law enforcement conducted interviews with TANKOUA, with the July 24, 2024, interview being audio-recorded with TANKOUA's consent. TANKOUA stated he deposited the Treasury Check into the Subject Bank Account and identified himself in a surveillance image from the ATM deposit. TANKOUA confirmed that he contacted BAYOI to receive help in opening the Subject Bank Account. TANKOUA stated BAYOI knew how to open fake bank accounts.

22. During the interview on July 24, 2024, TANKOUA stated he thought some of funds held in the Subject Bank Account, after the Treasury Check deposit, were frozen. However, TANKOUA stated he received between \$30,000 and \$38,000 for his role with the Treasury Check. TANKOUA claimed that he received this money from the people in Georgia. TANKOUA stated he traveled to Georgia and the money was received from multiple people, one of them being BAYOI.

23. TANKOUA stated he obtained the Treasury Check from another individual (M.D.D.) and M.D.D implied he/she may know someone, or multiple individuals, employed at the United States Postal Service who had the ability to steal checks from the mail.

24. M.D.D. was interviewed by law enforcement with his/her attorney present. M.D.D. indicated he/she knew TANKOUA. M.D.D. stated he/she recalled seeing the Treasury Check being passed around at a party he/she attended with a significant other, D.J.D. M.D.D. stated TANKOUA was not at this party.

25. A latent fingerprint test was conducted on the Treasury Check by the United States Secret Service. A positive result returned for D.J.D.


26. D.J.D. was interviewed by law enforcement with his/her attorney present. D.J.D. confirmed seeing and holding the Treasury Check at the same party he/she attended with M.D.D. D.J.D. denied knowing TANKOUA. D.J.D. denied knowing where the check came from.

27. At all times relevant to this affidavit, the deposits of Wells Fargo Bank, N.A., which held the Subject Bank Account, were insured by the Federal Deposit Insurance Corporation.

28. I submit that probable cause exists to believe that ORELIEN MARTIAL NGUEPI-TANKOUA ("TANKOUA"), JEAN PAUL BAYOI ("BAYOI"), and TAMBLYN FRASIER ("FRASIER") committed Bank Fraud, in violation of 18 U.S.C. §1344, and Conspiracy to Commit

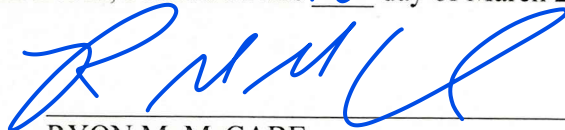
Bank Fraud, in violation of 18 U.S.C. §1349.

FURTHER AFFIANT SAYETH NAUGHT.



Adam J. Weisenstine
Special Agent
Federal Bureau of Investigations

Sworn to and attested to me by applicant by telephone (Facetime) per the requirements of Fed. R. Crim. P.4 (d) and 4.1 in West Palm Beach, Florida on this 10 day of March 2025.



RYON M. McCABE
UNITED STATES MAGISTRATE JUDGE